

Frankel & Newfield, P.C.

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VIA ECF

Hon. Judge Alison J. Nathan United States District Court Southern District of New York 40 Foley Square New York, NY 10007

> Re: Montenegro Romero v. The Prudential Insurance Company of America,

21 CV 04678 (AJN)

Dear Judge Nathan:

This firm represents Plaintiff, Yamile Andrea Montenegro Romero, in this action. I write to submit this joint letter requesting an adjournment of the initial conference currently scheduled for this matter on September 17, 2021 at 3:30 PM. Counsel for Plaintiff will be out of state and not available that date.

We propose the following dates of availability to the court: October 8, 2021 and October 15, 2021. Alternately, a day other than Friday might be more readily available. If the Court chooses to schedule the conference for a non-Friday, counsel have conferred and are available October 4-7, 11, 14, 18-21. If the conference goes forward on a Friday, Counsel for Defendant has advised that late afternoon conferences at that time may interfere with Sabbath observance, as counsel resides in Central New Jersey, and as such, would request that the conference be scheduled for the morning or early afternoon.

Thank you for your consideration and attention to this matter. The parties look forward to meeting with Your Honor on this case and appreciate Your Honor's consideration of this request.

SO ORDERED.

8/18/2021

The conference is adjourned to October 15, 2021 at 3:45 PM.

Very truly yours,

FRANKEL & NEWFIELD, P.C.

/s/ Jason A. Newfield By:

Jason A. Newfield

SEYFARTH SHAW LLP

By: /s/ Jacob Oslick

Jacob Oslick